

# EXHIBIT C

**CONTAINS McKESSON CONFIDENTIAL  
INFORMATION SUBJECT TO PROTECTIVE ORDER**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA**

**HUNTINGTON DIVISION**

**CITY OF HUNTINGTON, WEST  
VIRGINIA,**

**Plaintiff,**

**CASE NO. 3:17-CV-01362**

**v.**

**AMERISOURCEBERGEN DRUG  
CORPORATION, et al.**

**Defendants.**

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**CABELL COUNTY COMMISSION,**

**Plaintiff,**

**CASE NO. 3:17-CV-01665**

**v.**

**AMERISOURCEBERGEN DRUG  
CORPORATION, et al.**

**Defendants.**

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**DEFENDANT MCKESSON CORPORATION'S SUPPLEMENTAL  
OBJECTIONS AND RESPONSES TO PLAINTIFFS' FIRST  
COMBINED DISCOVERY REQUESTS TO DISTRIBUTORS (NOS. 1-11)**

Defendant McKesson Corporation ("McKesson") hereby provides its supplemental objections and responses to from the First Set of Combined Discovery Requests to Distributor Defendants propounded by Plaintiffs City of Huntington, West Virginia, and Cabell County Commission.

**GENERAL OBJECTIONS**

1. These responses are made solely for the purpose of these actions. By responding to these requests, McKesson does not waive any objections that it may have to the admission into evidence of these responses, or any documents and things produced in response to these requests, on any applicable grounds.

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2. McKesson objects to the definitions and instructions used in these requests to the extent that they purport to impose obligations or burdens on McKesson that go beyond those imposed by Federal Rules of Civil Procedure 26, 33, and 34, the Local Rules of the Southern District of West Virginia, and applicable Orders entered by the Court in these above-captioned actions (collectively “Discovery Rules”). McKesson will comply with the Discovery Rules, but assumes no further obligations in responding to these requests.

3. McKesson objects to these requests to the extent that they seek discovery that is not relevant to the parties’ claims and defenses, not proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties’ relative access to relevant information, the parties’ resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit, and that otherwise goes beyond the scope of permissible discovery at this stage of this proceeding, particularly to the extent they seek discovery that is not relevant to the above-captioned actions. As appropriate, McKesson will limit its responses to information and documents that relate to Cabell County and the City of Huntington. However, McKesson is willing to meet and confer with regard to the geographic scope of discovery as it relates to documents and information other than transactional data. McKesson has produced transactional data for the State of West Virginia, the Commonwealth of Kentucky, and the State of Ohio in compliance with the Order Regarding Track Two Cases (ECF No. 2950) at 5 entered prior to remand of the above-captioned actions.

4. McKesson objects to these requests to the extent that they include multiple subparts. McKesson further objects to these requests on the grounds that they are individually and collectively overly broad and unduly burdensome and seek discovery that is not relevant to

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the parties' claims and defenses and not proportional to the needs of the case. Plaintiffs' sweeping requests seek voluminous documents and records for a period spanning almost 30 years without any limits on custodians or non-custodial sources. To the extent that McKesson agrees to produce documents in response to these requests, McKesson is agreeing to produce only the documents it identifies in its response and only subject to an agreement on a reasonable number of custodians and non-custodial sources.

5. McKesson objects to these requests to the extent that they seek information or documents that are protected from disclosure by the attorney-client privilege, work product doctrine, joint defense privilege, common interest privilege, or any other applicable privilege or protection ("privileged information"). The inadvertent disclosure of privileged information or documents in response to these requests shall not be deemed a waiver of any privilege or right as to the privileged information inadvertently disclosed or any other information or documents relating to the subject matter of any inadvertently-disclosed privileged information.

6. McKesson objects to these requests, and to the definitions and instructions included with this set of requests, to the extent that any request, definition or instruction seeks disclosure of information protected by any confidentiality obligation owed to a third party. McKesson will not disclose or produce such information or documents absent notice to and, if required, consent of the third party or entry of a court order compelling production.

7. McKesson objects to these requests to the extent that they seek documents or information that: (a) are in Plaintiffs' possession, custody or control; (b) are not in McKesson's possession, custody, or control; (c) are equally or more readily available from sources other than McKesson; (d) Plaintiffs can obtain from other sources that are more convenient, less burdensome, and/or less expensive than requiring McKesson to provide the information; (e) are

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not reasonably accessible to McKesson; and/or (f) are publicly available to Plaintiffs. With regard to any response that McKesson provides, McKesson's response will be limited to relevant, responsive and non-privileged information or documents in its possession, custody or control located after a reasonable search that is proportional to the needs of the case.

8. McKesson objects to the requests to the extent that they contain terms that are not defined or terms that are defined in a vague, ambiguous, or unintelligible manner.

9. McKesson objects to the requests, and to the requests' definitions and instructions, to the extent that any request, definition or instruction: (a) is unduly burdensome, oppressive, overly broad, ambiguous, confusing or vague; (b) is duplicative or unreasonably cumulative of other discovery in this investigation; or (c) calls for McKesson to draw a legal conclusion in order to respond.

10. McKesson objects to the requests, and to the requests' definitions and instructions, to the extent that any request, definition or instruction assumes facts and events or includes characterizations that are assumed to be accurate, and contains legal conclusions. By providing responses to these requests, McKesson does not admit or concede that any assumed fact, event, characterization, or legal conclusion is correct or accurate and McKesson expressly reserves the right to contest any and all assumed facts, events, characterizations, and legal conclusions.

11. McKesson objects to each request, definition or instruction that purports to require that McKesson identify and provide discovery with regard to "each," "all," "any" or similar all-encompassing wording, on the grounds that such requests, definitions and instructions are overly broad, unduly burdensome, seek discovery that is not relevant to the parties' claims

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and defenses, not proportional to the needs of the case, and beyond the scope of permissible discovery.

12. McKesson objects to each request in this set to the extent that it seeks premature expert discovery or disclosure of expert opinions and goes beyond the scope of permissible expert discovery under the Discovery Rules. McKesson will provide expert discovery and disclosures on the dates set by the Court in compliance with the Discovery Rules, but assumes no further obligation in responding to these requests.

13. McKesson's responses are based upon information that has been collected and reviewed to date for the purpose of responding to these requests, and they are not prepared from the personal knowledge of any single individual. McKesson reserves the right to amend and supplement these responses as discovery and this litigation proceed.

**OBJECTIONS TO UNDEFINED TERMS**

1. McKesson objects to the undefined terms "You" and "Your" on the grounds that they are overly broad, vague, ambiguous, and purport to extend the requests beyond the Pharmaceutical Distribution business of McKesson Corporation and seek information and documents that are not in McKesson's possession, custody or control. For purposes of its responses, McKesson will define "You," "Your," and "McKesson" to mean McKesson's Pharmaceutical Distribution business<sup>1</sup> and will respond with regard to information and documents in its possession, custody or control.

2. McKesson objects to these requests to the extent they seek discovery about customers, but do not provide any definition for customer, on the grounds that these requests are

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<sup>1</sup> Prior to January 2019, McKesson's Pharmaceutical Distribution business was known as its U.S. Pharmaceutical Distribution business ("U.S. Pharma").

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overly broad, vague, ambiguous and unduly burdensome and potentially seek discovery that is not relevant to the parties' claims and defenses, nor reasonably calculated to lead to the discovery of admissible evidence. For purposes of its responses, McKesson will interpret "customers" as used in these requests and responses to mean McKesson customers in the State of West Virginia that are retail national accounts (including national and regional chains, food/drug combinations, mail order pharmacies and mass merchandisers), independent retail pharmacies (also referred to as Independent Small and Medium Chains or ISMCs), and institutional healthcare providers such as hospitals, health systems, integrated delivery networks and long-term care providers.

3. McKesson objects to the undefined term "prescription opioids" on the grounds that it is overly broad, vague, ambiguous and unduly burdensome, and seeks discovery that is not relevant to the parties' claims and defenses, nor proportional to the needs of the case. For purposes of responding to these requests, McKesson will interpret "prescription opioids" to mean products with one of the following DEA drug codes and drug code names:

<b>Base code</b>	<b>Base code description</b>
9737	ALFENTANIL
9064	BUPRENORPHINE
9720	BUTORPHANOL
M804	CODEINE (W/PROMETHAZ)
9050	CODEINE CII
9804	CODEINE COMBINATION
M805	CODEINE PREPARATIONS
9168	DIFENOXIN
9120	DIHYDROCODEINE
9807	DIHYDROCODEINE COMBI
9170	DIPHENOXYLATE
9801	FENTANYL
9193	HYDROCODONE
9150	HYDROMORPHONE
9220	LEVORPHANOL

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<b>Base code</b>	<b>Base code description</b>
9230	MEPERIDINE
9250	METHADONE
9300	MORPHINE
9639	OPIUM POWDERED
9630	OPIUM TINCTURE
9143	OXYCODONE
9652	OXYMORPHONE
9809	PAREGORIC
9709	PENTAZOCINE
9273	PROPOXYPHENE
9739	REMIFENTANIL
9740	SUFENTANIL
9780	TAPENTADOL
9752	TRAMADOL

4. McKesson objects to the undefined term suspicious order to the extent that it differs from or extends beyond the definition of suspicious order used by the DEA on the grounds that it is overly broad, vague, ambiguous and unduly burdensome, and seeks discovery that is not relevant to the parties' claims and defenses, nor proportional to the needs of the case. For purposes of its responses, McKesson will interpret suspicious order using the DEA's definition for this term.

5. McKesson objects to plaintiffs' time period instruction seeking discovery for the time period commencing January 1, 1996, on the grounds that this demand for discovery for a time period is overly broad, vague, ambiguous and unduly burdensome, and seeks discovery that is not relevant to the parties' claims and defenses, nor proportional to the needs of the case. Unless otherwise stated, McKesson's responses will be limited to the time period January 1, 2006 to the date of its response.



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**OBJECTIONS AND RESPONSES TO REQUESTS FOR PRODUCTION**

**REQUEST NO. 1:**

Please produce all *transactional data* related to the distribution of prescription opioids arising out of CT2 from January 1, 1996, to the present.

**RESPONSE TO REQUEST NO. 1 (11/29/2019):**

McKesson objects to this request on the grounds set forth in its General Objection Nos. 1-13 and Objections to Undefined Terms Nos. 1-6, which are incorporated by reference herein. Subject to and without waiving these objection, McKesson responds as follows:

McKesson will produce transactional data for shipments to McKesson customers in the State of West Virginia, the State of Ohio, and the Commonwealth for the time period beginning October 1, 2004.

**SUPPLEMENTAL RESPONSE TO REQUEST NO. 1 (02/28/2020):**

McKesson incorporates by reference its objections and response to this request as stated above. Subject to and without waiving these objections, McKesson responds that it has produced the following transactional data for customers in West Virginia:

MCKMDL01391082 MCKMDL112	MCKMDL01391096	Transactional Data for Non-Controlled Rx 10/1/2004 - 12/31/2018 State of West Virginia Customers
MCKMDL01391097 MCKMDL112	MCKMDL01391111	Transactional Data for Non-Opioid Controlled Substances 10/1/2004 - 12/31/2018 State of West Virginia Customers
MCKMDL01391112 MCKMDL112	MCKMDL01391126	Transactional Data for Opioids 10/1/2004 - 12/31/2018 State of West Virginia Customers

McKesson also has produced transactional data for customers in the Commonwealth of Kentucky (production nos. MCKMDL01390992 – MCKMDL01391036) and the State of Ohio (production nos. MCKMDL01391037 – MCKMDL01391081).

**REQUEST NO. 2:**

Please identify in chronological order the title of each *Suspicious Order Monitoring System (SOMS)* policy in force from January 1, 1996, to the present and produce a copy of the same. After each entry, please identify the Bates range which corresponds to each policy to enable a jury to correlate each policy in your written answer to each document produced.

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**RESPONSE TO REQUEST NO. 2 (11/29/2019):**

McKesson objects to this request on the grounds set forth in its General Objection Nos. 1-13 and Objections to Undefined Terms Nos. 1-6, which are incorporated by reference herein. Subject to and without waiving these objection, McKesson responds as follows:

McKesson has produced documents responsive to this request in MDL 2804.

**SUPPLEMENTAL RESPONSE TO REQUEST NO. 2 (02/28/2020):**

McKesson incorporates by reference its objections and response to this request as stated above. Subject to and without waiving these objections, McKesson responds that the attached Appendix A lists the policies and procedures for its Controlled Substance Monitoring Program (“CSMP”) and earlier monitoring programs in chronological order, including multiple produced copies for certain versions of those policies and procedures.

**REQUEST NO. 3:**

Please identify each *suspicious order* you reported to any regulatory body, including the DEA and/or the West Virginia Board of Pharmacy, arising out of CT2 and produce all documents related thereto. After each entry, please identify the Bates range which corresponds to each suspicious order to enable a jury to correlate each suspicious order in your written answer to each document produced.

**RESPONSE TO REQUEST NO. 3 (11/29/2019):**

McKesson objects to this request on the grounds set forth in its General Objection Nos. 1-13 and Objections to Undefined Terms Nos. 1-6, which are incorporated by reference herein. Subject to and without waiving these objection, McKesson responds as follows:

McKesson will produce a blocked order report with regard to customers in West Virginia.

**SUPPLEMENTAL RESPONSE TO REQUEST NO. 3 (02/28/2020):**

McKesson incorporates by reference its objections and response to this request as stated above. Subject to and without waiving these objections, McKesson responds that it has produced a blocked order report for opioid orders that were not shipped to McKesson customers in the State of West Virginia because they exceeded that threshold for the customer and the opioid product (production no. MCKMDL01391127).

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**REQUEST NO. 4:**

Please produce the *due diligence file* for each of your customers in CT2. Please identify the Bates range which corresponds to each due diligence file to enable a jury to correlate each due diligence file to each of your documents.

**RESPONSE TO REQUEST NO. 4 (11/29/2019):**

McKesson objects to this request on the grounds set forth in its General Objection Nos. 1-13 and Objections to Undefined Terms Nos. 1-6, which are incorporated by reference herein. Subject to and without waiving these objection, McKesson responds as follows:

McKesson will produce diligence files for customers in West Virginia.

**SUPPLEMENTAL RESPONSE TO REQUEST NO. 4 (02/28/2020):**

McKesson incorporates by reference its objections and response to this request as stated above. Subject to and without waiving these objections, McKesson responds that certain diligence files were produced in the action brought by the West Virginia Attorney General, as follows:

DEA #	Customer	Beginning MDL No.	Ending MDL No.
AC2977556	CABELL HH IP 340B PHS	MCKMDL00361092	MCKMDL00361103
BP0795433	COMPRECARE PHCY	MCKMDL00356945	MCKMDL00356992
BM6622167	CONTINUUMCARE PHCY LTC	MCKMDL00368075	MCKMDL00368093
BM9558733	MCCLOUD FAMILY PHARMACY	MCKMDL00358572	MCKMDL00358624
BM3744489	MEDICAL ARTS PHARMACY	MCKMDL00359741	MCKMDL00359817
BM6647739	MEDICAL ASSOCIATES PHCY	MCKMDL00368103	MCKMDL00368105
FA3682348	ROSS DRUG	MCKMDL00359956	MCKMDL00359978
BV6022228	VALLEY HEALTH PHARMACY	MCKMDL00357132	MCKMDL00357219
BV6022228	VALLEY HEALTH PHARMACY	MCKMDL00365652	MCKMDL00365836
FV6047648	VALLEY HEALTH PHCY PHS	MCKMDL00358977	MCKMDL00359015
AV5458648	VAMC 581-HUNTINGTON	MCKMDL00360871	MCKMDL00360890

McKesson also has collected additional documents from the four central locations that is has used over time to store diligence files (hard copy, SharePoint, R: drive, and McKCAT) and produced them in this action:

MCKMDL01581299 MCKMDL129	MCKMDL01581299	Diligence files materials for Cabell County/City of Huntington (WV) Customers (from SharePoint)
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MCKMDL01581300 MCKMDL130	MCKMDL01581366	Diligence files (TCR/Onboarding) materials for McKesson Cabell County/City of Huntington (WV) Customers (from McKCAT platform)
MCKMDL01581367 MCKMDL131	MCKMDL01581371	Diligence files materials for McKesson Cabell County/City of Huntington (WV) Customers (from hard copy and R Drive files)

McKesson continues to collect, review and produce documents from the files of ESI custodians. Those files may contain diligence-related documents for McKesson customers in Cabell County and the City of Huntington, West Virginia.

**REQUEST NO. 5:**

Please identify each *sales representative(s)* responsible for CT2 territory and produce the custodial file for each. Please identify the Bates range which corresponds to each custodial file to enable a jury to correlate each name in your written answer to each custodial file produced.

**RESPONSE TO REQUEST NO. 5 (11/29/2019):**

McKesson objects to this request on the grounds set forth in its General Objection Nos. 1-13 and Objections to Undefined Terms Nos. 1-6, which are incorporated by reference herein. Subject to and without waiving these objection, McKesson responds as follows:

McKesson will conduct a reasonable search and produce information responsive to this request.

**SUPPLEMENTAL RESPONSE TO REQUEST NO. 5 (02/28/2020):**

McKesson incorporates by reference its objections and response to this request as stated above. Subject to and without waiving these objections, McKesson responds that Timothy Ashworth (who was previously produced in the West Virginia Attorney General action) was the Retail Sales Manager for McKesson customers in Cabell County and the City of Huntington, West Virginia. As of his June 2018 deposition, Mr. Ashworth reported to District Sales Manager Michael Brown. Until he left McKesson, Thomas Terry was the VP Sales, ISMC, with territory that included Cabell County and the City of Huntington, West Virginia.

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**REQUEST NO. 6:**

Please produce all documents in your possession, custody and/or control related to *Safescript Pharmacy #6* (DEA# BS8246349) formerly located at 335 Fourth Avenue in Huntington, Cabell County, West Virginia.

**RESPONSE TO REQUEST NO. 6 (11/29/2019):**

McKesson objects to this request on the grounds set forth in its General Objection Nos. 1-13 and Objections to Undefined Terms Nos. 1-6, which are incorporated by reference herein. Subject to and without waiving these objection, McKesson responds as follows:

McKesson will conduct a reasonable search and produce documents responsive to this request.

**SUPPLEMENTAL RESPONSE TO REQUEST NO. 6 (02/28/2020):**

McKesson incorporates by reference its objections and response to this request as stated above. Subject to and without waiving these objections, McKesson responds that it has not identified documents relating to Safescript Pharmacy #6 (which was not a McKesson customer) based on its investigation to date.

**REQUEST NO. 7:**

Please produce all documents in your possession, custody and/or control related to **Anita T. Dawson, DO** (CSL# OD0926) formerly practicing medicine at 1798 Midland Trail, Milton, Cabell County, West Virginia.

**RESPONSE TO REQUEST NO. 7 (11/29/2019):**

McKesson objects to this request on the grounds set forth in its General Objection Nos. 1-13 and Objections to Undefined Terms Nos. 1-6, which are incorporated by reference herein. Subject to and without waiving these objection, McKesson responds as follows:

McKesson will conduct a reasonable search and produce documents responsive to this request.

**SUPPLEMENTAL RESPONSE TO REQUEST NO. 7 (02/28/2020):**

McKesson incorporates by reference its objections and response to this request as stated above. Subject to and without waiving these objections, McKesson responds that it has not identified documents relating to Anita T. Dawson, DO, based on its investigation to date.

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**REQUEST NO. 8:**

Please produce all documents produced to the United States House Energy and Commerce Committee arising out of its investigation into “opioid dumping” into West Virginia.

**RESPONSE TO REQUEST NO. 8 (11/29/2019):**

McKesson objects to this request on the grounds set forth in its General Objection Nos. 1-13 and Objections to Undefined Terms Nos. 1-6, which are incorporated by reference herein. Subject to and without waiving these objection, McKesson responds as follows:

McKesson has produced these documents in MDL 2804.

**SUPPLEMENTAL RESPONSE TO REQUEST NO. 8 (02/28/2020):**

McKesson incorporates by reference its objections and response to this request as stated above. Subject to and without waiving these objections, McKesson responds that it has produced the documents it provided to the United States House Energy and Commerce Committee as follows:

<b>MDL Beginning No. &amp; Volume</b>	<b>MDL Ending No.</b>	<b>HOI Production Nos. &amp; Volume</b>
MCKMDL00330211 MCKMDL003-001	MCKMDL00330923	MCK-HOI-001-0000001 - MCK-HOI-001-0000713 MCK-HOI-001
MCKMDL00330924 MCKMDL003-001	MCKMDL00332931	MCK-HOI-002-0000001 - MCK-HOI-002-0002008 MCK-HOI-002
MCKMDL00332932 MCKMDL003-001	MCKMDL00332955	MCK-HOI-00300000001 - MCK-HOI-00300000022 MCK-HOI-003

**REQUEST NO. 9:**

Please produce all documents produced to the West Virginia Attorney General.

**RESPONSE TO REQUEST NO. 9 (11/29/2019):**

McKesson objects to this request on the grounds set forth in its General Objection Nos. 1-13 and Objections to Undefined Terms Nos. 1-6, which are incorporated by reference herein. Subject to and without waiving these objection, McKesson responds as follows:

McKesson has produced these documents in MDL 2804.

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**SUPPLEMENTAL RESPONSE TO REQUEST NO. 9 (02/28/2020):**

McKesson incorporates by reference its objections and response to this request as stated above. Subject to and without waiving these objections, McKesson responds that it has produced the documents that it produced to the West Virginia Attorney General as follows:

<b>MDL Beginning No. &amp; Volume</b>	<b>MDL Ending No.</b>	<b>HOI Production Nos. &amp; Volume</b>
MCKMDL00374945 MCKMDL004-002	MCKMDL00380773	MCK-WVAG-001-0000001 - MCK-WVAG-001-0005687 MCK-WVAG-001
MCKMDL00380774 MCKMDL004-002	MCKMDL00381417	MCK-WVAG-002-0000001 - MCK-WVAG-002-0000644 MCK-WVAG-002
MCKMDL00354205 MCKMDL004-001	MCKMDL00356234	MCK-WVAG-003-0000001 - MCK-WVAG-003-0002030 MCK-WVAG-003
MCKMDL00356235 MCKMDL004-001	MCKMDL00368196	MCK-WVAG-004-0000001 - MCK-WVAG-004-0011962 MCK-WVAG-004
MCKMDL00381418 MCKMDL004-002	MCKMDL00381419	MCK-WVAG-005-0000001 - MCK-WVAG-005-0000002 MCK-WVAG-005
MCKMDL00396068 MCKMDL007	MCKMDL00397860	MCK-WVAG-006-0000001 - MCK-WVAG-006-0001793 MCK-WVAG-006

**REQUEST NO. 10:**

Please produce all documents related to internal investigations referencing the distribution of prescription opioids in West Virginia.

**RESPONSE TO REQUEST NO. 10 (11/29/2019):**

McKesson objects to this request on the grounds set forth in its General Objection Nos. 1-13 and Objections to Undefined Terms Nos. 1-6, which are incorporated by reference herein. Subject to and without waiving these objection, McKesson responds as follows:

McKesson has produced documents responsive to this request in MDL 2804. To the extent that this request seeks additional documents, McKesson is willing to meet and confer to attempt to reasonably narrow this request.

**SUPPLEMENTAL RESPONSE TO REQUEST NO. 10 (02/28/2020):**

McKesson incorporates by reference its objections and response to this request as stated above. Pursuant to its agreement with Plaintiffs, McKesson interprets this request to call for



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investigations other than investigations conducted by Covington & Burling as outside counsel for McKesson, including any investigations related to the action filed by the West Virginia Attorney General. Subject to and without waiving these objections, McKesson responds that it has not identified any non-privileged documents responsive to this request based on its investigation to date.

**REQUEST NO. 11:**

Please produce all presentations, including PowerPoints or slide decks, referencing the distribution of prescription opioids in West Virginia.

**RESPONSE TO REQUEST NO. 11 (11/29/2019):**

McKesson objects to this request on the grounds set forth in its General Objection Nos. 1-13 and Objections to Undefined Terms Nos. 1-6, which are incorporated by reference herein. Subject to and without waiving these objection, McKesson responds as follows:

McKesson has produced these documents in MDL 2804.

**SUPPLEMENTAL RESPONSE TO REQUEST NO. 11 (02/28/2020):**

McKesson incorporates by reference its objections and response to this request as stated above. Subject to and without waiving these objections, McKesson responds based on its investigation to date that it has identified and produced a presentation made to the DEA and the United States Attorney General, Northern District of West Virginia (production nos. MCKMDL00409116-73; MCKMDL00707242-99).

Dated: February 28, 2018

/s/ Dale A. Rice  
Dale A. Rice  
Covington & Burling LLP



**CHRONOLOGY: McKESSON CONTROLLED SUBSTANCE MONITORING  
PROGRAM (“CSMP”) AND EARLIER MONITORING PROGRAMS**

<b>Document Name</b>	<b>Version</b>	<b>Date</b>	<b>Beginning No.</b>	<b>Ending No.</b>
Drug Operations Manual, Section 55, DEA Compliance	#107	1/1997	MCKMDL00651873	MCKMDL00652197
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL00354205	MCKMDL00354341
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL01515573	MCKMDL01515587
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL00737726	MCKMDL00737738
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL00640287	MCKMDL00640294
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL01068849	MCKMDL01068985
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL00567631	MCKMDL00567767
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL01243274	MCKMDL01243410
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL00517870	MCKMDL00518006
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL00575694	MCKMDL00575830
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL00575882	MCKMDL00576018
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL00576027	MCKMDL00576163
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL00576172	MCKMDL00576308
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL00576317	MCKMDL00576453
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL00576462	MCKMDL00576598
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL00576653	MCKMDL00576789
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL00613059	MCKMDL00613194
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL00545378	MCKMDL00545514
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL00545868	MCKMDL00546004
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL00530453	MCKMDL00530475
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL00523080	MCKMDL00523105
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL00456271	MCKMDL00456296
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL01523845	MCKMDL01523981
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL00331008	MCKMDL00331141
Drug Operations Manual, 55-Controlled Substances		7/2000	MCKMDL00708748	MCKMDL00709281
Drug Operations Manual, 55-Controlled Substances		3/1/2007	MCKMDL00533763	MCKMDL00533903
Lifestyle Drug Monitoring Program	1	5/8/2007	MCKMDL00832327	MCKMDL00832336
Lifestyle Drug Monitoring Program	1	5/8/2007	MCKMDL00623791	MCKMDL00623800

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Lifestyle Drug Monitoring Program	1.4	5/16/2007	MCKMDL00706863	MCKMDL00706896
Lifestyle Drug Monitoring Program		5/16/2007	MCKMDL00355251	MCKMDL00355256
Lifestyle Drug Monitoring Program	1.4	5/16/2007	MCKMDL00330931	MCKMDL00330964
Lifestyle Drug Monitoring Program		5/16/2007	MCKMDL00591850	MCKMDL00591857
Lifestyle Drug Monitoring Program	1.7	12/6/2007	MCKMDL00622632	MCKMDL00622640
Lifestyle Drug Monitoring Program	1.7	12/6/2007	MCKMDL01515528	MCKMDL01515540
Lifestyle Drug Monitoring Program	1.7	12/6/2007	MCKMDL00355041	MCKMDL00355050
Lifestyle Drug Monitoring Program		2007 (est.)	MCKMDL00330211	MCKMDL00330216
CSMP Operating Manual	1.4	6/16/2008	MCKMDL00518107	MCKMDL00518123
CSMP Operating Manual	1.6	6/24/2008	MCKMDL00518064	MCKMDL00518080
CSMP Operating Manual	1.6	6/24/2008	MCKMDL00518083	MCKMDL00518099
CSMP Operating Manual	1.6	6/24/2008	MCKMDL00518046	MCKMDL00518062
CSMP Operating Manual	1.10	8/18/2008	MCKMDL00533239	MCKMDL00533259
CSMP Operating Manual	1.13	6/16/2009	MCKMDL00640255	MCKMDL00640286
CSMP Operating Manual	1.16	12/1/2009	MCKMDL01092657	MCKMDL01092689
CSMP Operating Manual		6/22/2010	MCKMDL01068990	MCKMDL01069022
CSMP Operating Manual	1.22	1/26/2011	MCKMDL00629762	MCKMDL00629786
CSMP Operating Manual	1.22	1/26/2011	MCKMDL00368261	MCKMDL00368286
CSMP Operating Manual	1.22	1/26/2011	MCKMDL00373842	MCKMDL00373867
CSMP Operating Manual	1.4	1/28/2011	MCKMDL01405537	MCKMDL01405538
CSMP Operating Manual		4/4/2011	MCKMDL00510935	MCKMDL00510938
CSMP Operating Manual		4/4/2011	MCKMDL00510940	MCKMDL00510943
CSMP Operating Manual		6/24/2011	MCKMDL00511209	MCKMDL00511215
CSMP Operating Manual	1.29	9/28/2012	MCKMDL00721847	MCKMDL00721878
CSMP Operating Manual	1.31	12/18/2012	MCKMDL01509699	MCKMDL01509728
CSMP Operating Manual		1/7/2013	MCKMDL00497844	MCKMDL00497858
CSMP Operating Manual		1/7/2013	MCKMDL00537269	MCKMDL00537281
CSMP Operating Manual		1/7/2013	MCKMDL00513801	MCKMDL00513813
CSMP Operating Manual		1/7/2013	MCKMDL00513879	MCKMDL00513891
CSMP Operating Manual		1/7/2013	MCKMDL00533964	MCKMDL00533981
CSMP Operating Manual		1/7/2013	MCKMDL00516387	MCKMDL00516399

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CSMP Operating Manual		1/7/2013	MCKMDL00523627	MCKMDL00523639
CSMP Operating Manual	1.36	3/20/2013	MCKMDL00002509	MCKMDL00002539
CSMP Operating Manual		5/2/2013	MCKMDL00513939	MCKMDL00513972
CSMP Operating Manual		5/8/2013	MCKMDL00534025	MCKMDL00534058
CSMP Operating Manual	1.38	5/8/2013	MCKMDL00533985	MCKMDL00534024
CSMP Operating Manual		5/9/2013	MCKMDL00516408	MCKMDL00516441
CSMP Operating Manual		5/9/2013	MCKMDL00513998	MCKMDL00514031
CSMP Operating Manual		5/9/2013	MCKMDL00524313	MCKMDL00524346
CSMP Operating Manual		5/30/2013	MCKMDL00514094	MCKMDL00514127
CSMP Operating Manual	1.43	9/24/2013	MCKMDL00354536	MCKMDL00354567
CSMP Operating Manual	1.43	9/24/2013	MCKMDL00326902	MCKMDL00326933
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CSMP Operating Manual	1.43	9/24/2013	MCKMDL00386662	MCKMDL00386693
CSMP Operating Manual	1.43	9/24/2013	MCKMDL00370781	MCKMDL00370812
CSMP Operating Manual	1.43	9/24/2013	MCKMDL00371274	MCKMDL00371305
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CSMP Operating Manual	1.43	9/24/2013	MCKMDL00370993	MCKMDL00371024
CSMP Operating Manual	1.43	9/24/2013	MCKMDL00383170	MCKMDL00383178
CSMP Operating Manual	1.43	9/24/2013	MCKMDL00383179	MCKMDL00383210

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CSMP Operating Manual		10/9/2013	MCKMDL00395753	MCKMDL00395778
CSMP Operating Manual		12/2/2013	MCKMDL00385283	MCKMDL00385291
CSMP Operating Manual		7/16/2014	MCKMDL01067600	MCKMDL01067611
CSMP Operating Manual		8/21/2014	MCKMDL01092395	MCKMDL01092424
CSMP Operating Manual		9/11/2014	MCKMDL01369485	MCKMDL01369493
ISMC CSMP Operating Manual	1.1	5/22/2015	MCKMDL00456680	MCKMDL00456752
ISMC CSMP Operating Manual	1.1	5/22/2015	MCKMDL00430506	MCKMDL00430578
ISMC CSMP Operating Manual	1.1	5/27/2015	MCKMDL00560559	MCKMDL00560628
ISMC CSMP Operating Manual	1.1	5/27/2015	MCKMDL00427530	MCKMDL00427599
ISMC CSMP Operating Manual	1.1	5/27/2015	MCKMDL00427601	MCKMDL00427670
ISMC CSMP Operating Manual	1	5/27/2015	MCKMDL00355146	MCKMDL00355215
ISMC CSMP Operating Manual	1.1	6/1/2015	MCKMDL01399635	MCKMDL01399707
ISMC CSMP Operating Manual	1.0	6/1/2015	MCKMDL00696597	MCKMDL00696666
ISMC CSMP Operating Manual	1.1	6/1/2015	MCKMDL00514891	MCKMDL00514960
ISMC CSMP Operating Manual	1.1	6/1/2015	MCKMDL00636809	MCKMDL00636878
ISMC CSMP Operating Manual	1	6/1/2015	MCKMDL00354963	MCKMDL00355032
ISMC CSMP Operating Manual	1	6/1/2015	MCKMDL00371272	MCKMDL00371273
ISMC CSMP Operating Manual	1.1	6/1/2015	MCKMDL00583429	MCKMDL00583498
ISMC CSMP Operating Manual	1	6/1/2015	MCKMDL00330099	MCKMDL00330168
ISMC CSMP Operating Manual	1.1	6/1/2015	MCKMDL00515046	MCKMDL00515115
ISMC CSMP Operating Manual	1	6/1/2015	MCKMDL00553599	MCKMDL00553671
ISMC CSMP Operating Manual	1	6/1/2015	MCKMDL00553679	MCKMDL00553751
ISMC CSMP Operating Manual	1	6/1/2015	MCKMDL00330474	MCKMDL00330543
ISMC CSMP Operating Manual	1	6/1/2015	MCKMDL00330544	MCKMDL00330613
ISMC CSMP Operating Manual	1	6/1/2015	MCKMDL00371245	MCKMDL00371246
ISMC CSMP Operating Manual	1	6/1/2015	MCKMDL00383059	MCKMDL00383128
ISMC CSMP Operating Manual	1.1	6/1/2015	MCKMDL00514964	MCKMDL00515033
ISMC CSMP Operating Manual	1.2	9/29/2015	MCKMDL00666251	MCKMDL00666325
ISMC CSMP Operating Manual	1.2	9/29/2015	MCKMDL00557961	MCKMDL00558036

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ISM C SMP Operating Manual	1.2	9/30/2015	MCKMDL01014874	MCKMDL01014951
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ISM C SMP Operating Manual	1.2	9/30/2015	MCKMDL00583353	MCKMDL00583428
ISM C SMP Operating Manual	1.2	9/30/2015	MCKMDL00693769	MCKMDL00693844
ISM C SMP Operating Manual	1.2	9/30/2015	MCKMDL00559315	MCKMDL00559390
ISM C SMP Operating Manual	1.2	9/30/2015	MCKMDL00579625	MCKMDL00579700
ISM C SMP Operating Manual	1.2	9/30/2015	MCKMDL01400362	MCKMDL01400437
ISM C SMP Operating Manual	1.2	9/30/2015	MCKMDL00354887	MCKMDL00354962
ISM C SMP Operating Manual	1.2	9/30/2015	MCKMDL00517193	MCKMDL00517268
ISM C SMP Operating Manual	1.2	9/30/2015	MCKMDL00517271	MCKMDL00517346
ISM C SMP Operating Manual	1.2	9/30/2015	MCKMDL00559806	MCKMDL00559881
ISM C SMP Operating Manual	1.2	9/30/2015	MCKMDL00449485	MCKMDL00449560
ISM C SMP Operating Manual	1.2	9/30/2015	MCKMDL00719857	MCKMDL00719932
ISM C SMP Operating Manual	1.2	9/30/2015	MCKMDL00719933	MCKMDL00720010
ISM C SMP Operating Manual	1.2	9/30/2015	MCKMDL00578962	MCKMDL00579037
ISM C SMP Operating Manual	1.2	9/30/2015	MCKMDL00441267	MCKMDL00441342
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ISM C SMP Operating Manual	1.2	9/30/2015	MCKMDL00579839	MCKMDL00579914
ISM C SMP Operating Manual	1.2	9/30/2015	MCKMDL00560483	MCKMDL00560558
ISM C SMP Operating Manual	1.2	9/30/2015	MCKMDL00442438	MCKMDL00442441
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ISM C SMP Operating Manual	1.2	9/30/2015	MCKMDL00456311	MCKMDL00456386
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ISM C SMP Operating Manual	1.2	9/30/2015	MCKMDL00330614	MCKMDL00330689
ISM C SMP Operating Manual	1.2	9/30/2015	MCKMDL00621007	MCKMDL00621084

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ISMC CSMP Operating Manual	1.2	9/30/2015	MCKMDL00621085	MCKMDL00621160
ISMC CSMP Operating Manual	1.2	9/30/2015	MCKMDL00395256	MCKMDL00395331
ISMC CSMP Operating Manual	1.2	9/30/2015	MCKMDL01405995	MCKMDL01406072
ISMC CSMP Operating Manual	1.2	9/30/2015	MCKMDL00722309	MCKMDL00722384
ISMC CSMP Operating Manual	1.2	9/30/2015	MCKMDL00333059	MCKMDL00333134
ISMC CSMP Operating Manual	1.3	1/6/2016	MCKMDL00446527	MCKMDL00446577
RNA CSMP Operating Manual	1.2	1/8/2016	MCKMDL00449333	MCKMDL00449408
CSMP Operating Manual	1.45	6/1/2016	MCKMDL00533189	MCKMDL00533210
CSMP Operating Manual	1.45	6/1/2016	MCKMDL00532347	MCKMDL00532368
RNA CSMP Operating Manual	1.2	1/11/2016	MCKMDL00449409	MCKMDL00449484
ISMC CSMP Operating Manual	1.2	11/21/2016	MCKMDL00446432	MCKMDL00446526
ISMC CSMP Operating Manual	1.2	11/21/2016	MCKMDL00560834	MCKMDL00560928
ISMC CSMP Operating Manual	1.2	11/29/2016	MCKMDL00560929	MCKMDL00561022
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ISMC CSMP Operating Manual	1.3	12/1/2016	MCKMDL00417291	MCKMDL00417340
ISMC CSMP Operating Manual	1.3	12/2/2016	MCKMDL00417240	MCKMDL00417289
ISMC CSMP Operating Manual	1.3	12/18/2016	MCKMDL00561023	MCKMDL00561072
ISMC CSMP Operating Manual	1.3	1/5/2017	MCKMDL00666651	MCKMDL00666700
ISMC CSMP Operating Manual	1.3	1/5/2017	MCKMDL00560784	MCKMDL00560833
ISMC CSMP Operating Manual	1.3	1/5/2017	MCKMDL00555014	MCKMDL00555063
ISMC CSMP Operating Manual	1.3	1/6/2017	MCKMDL00443208	MCKMDL00443257
ISMC CSMP Operating Manual	1.3	1/6/2017	MCKMDL00560683	MCKMDL00560732
ISMC CSMP Operating Manual	1.3	1/6/2017	MCKMDL00354837	MCKMDL00354886
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ISMC CSMP Operating Manual	1.3	1/6/2017	MCKMDL00720011	MCKMDL00720060
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ISMC CSMP Operating Manual	1.3	1/6/2017	MCKMDL01570510	MCKMDL01570559

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ISMC CSMP Operating Manual	1.3	1/6/2017	MCKMDL00333009	MCKMDL00333058
ISMC CSMP Operating Manual	1.4	5/16/2017	MCKMDL00664513	MCKMDL00664562
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RNA CSMP Operating Manual	1	8/25/2017	MCKMDL00434702	MCKMDL00434777
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RNA CSMP Operating Manual	1	11/8/2017	MCKMDL00450576	MCKMDL00450648
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RNA CSMP Operating Manual	1	3/22/2018	MCKMDL00457886	MCKMDL00457922
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RNA CSMP Operating Manual	1	4/3/2018	MCKMDL00439002	MCKMDL00439038
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RNA CSMP Operating Manual	1.1	4/10/2018	MCKMDL00570108	MCKMDL00570146
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RNA CSMP Operating Manual	1.1	4/13/2018	MCKMDL00450177	MCKMDL00450212
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RNA CSMP Operating Manual	1	4/17/2018	MCKMDL00450213	MCKMDL00450248
RNA CSMP Operating Manual	1	4/17/2018	MCKMDL00450249	MCKMDL00450285
RNA CSMP Operating Manual	1	4/17/2018	MCKMDL00450286	MCKMDL00450321
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RNA CSMP Operating Manual	1	4/17/2018	MCKMDL00437887	MCKMDL00437922
RNA CSMP Operating Manual	1	4/17/2018	MCKMDL00449954	MCKMDL00449990
RNA CSMP Operating Manual	1	4/17/2018	MCKMDL00450322	MCKMDL00450357
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RNA CSMP Operating Manual	1	4/17/2018	MCKMDL00449954	MCKMDL00449990
RNA CSMP Operating Manual	1	4/17/2018	MCKMDL00450322	MCKMDL00450357
RNA CSMP Operating Manual	1	4/17/2018	MCKMDL00355260	MCKMDL00355295
RNA CSMP Operating Manual	1	4/17/2018	MCKMDL00355260	MCKMDL00355295
RNA CSMP Operating Manual	1	4/17/2018	MCKMDL00781985	MCKMDL00782020
RNA CSMP Operating Manual	1	4/17/2018	MCKMDL00782104	MCKMDL00782139
RNA CSMP Operating Manual	1	4/17/2018	MCKMDL00337325	MCKMDL00337618
ISMC CSMP Operating Manual	1.5	6/12/2018	MCKMDL01212732	MCKMDL01212787

**CERTIFICATE OF SERVICE**

I, Dale A. Rice, hereby certify that on February 28, 2020, **DEFENDANT MCKESSON CORPORATION'S SUPPLEMENTAL OBJECTIONS AND RESPONSES TO PLAINTIFFS' FIRST COMBINED DISCOVERY REQUESTS TO DISTRIBUTORS** was served on counsel for plaintiffs and defendants pursuant to the agreement regarding service on plaintiffs, directed to the email addresses listed below.

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By: /s/ Dale A. Rice  
Dale A. Rice